

Hall-Jordan, Luke

From: Donaldson, David
Sent: Thursday, January 23, 2014 7:02 PM
To: Hufford, Drusilla; Horwitz, Paul; Newberg, Cindy
Cc: Whiteley, Elizabeth; Hall-Jordan, Luke
Subject: Readout on the proposed HCFC allocation rule hearing
Attachments: Alliance comments from 23-Jan-13 HCFC-22 hearing.pdf

Hi Drusilla,

We will schedule a discussion with you tomorrow to provide additional detail, but for now I wanted to give you a quick readout from the hearing today. The transcript of the hearing will be ready for posting to the docket within two weeks. There were approximately 50 stakeholder participants, ten of whom provided oral comment. I provide a brief summary of comments below.

The Alliance (statement attached) indicated support for the lowest five year linear drawdown, which allocates 10,000 MT in 2015, and support this option because it provides the lowest amount in 2015. They also asked that we take into account HCFC-22 inventory levels in determining the allocation levels, and that we consider the impact on reclaimers, not over allocating and not under allocating. They thanked us for collecting HCFC stocks data in 2013 and recommend that we incorporate this practice into tracking and reporting requirements. They continue to ask us to move expeditiously towards a final rule. They noted problems with HCFC-22 replacements (safety, suitability, and contamination), and asked that we consider these problems under SNAP and 608. Finally, they believe we should update the Vintaging Model, and offered to assist in this process.

The coalition of reclaimers and small importers organized by Pete Williams and represented by Caffey Norman of Patton Boggs had several members provide oral comment. As expected, their primary point is that there is too much HCFC-22 allocated to allow for profitable reclamation and they suggest an allocation of zero beginning in 2015. They also believe that small business interests are not fully considered in the rule making process and asked that we conduct a small business panel. Caffey also asked that we schedule a meeting with him in the next couple of weeks to discuss these issues.

Of the large allowance holders, DuPont and Honeywell provided oral comment. They tentatively support a linear drawdown allocation, but are continuing to evaluate the options from their company perspectives. DuPont has asked that we schedule a meeting in the next couple of weeks in order for them to provide more details.

Both NRDC and EIA provided oral comment, and both support an allocation of zero beginning in 2015.

Both Jerry Dykstra and EIA asked that the Agency dedicate additional resources to enforcement of venting and import requirements.

Goodman was the only OEM to provide comment and they support a five year linear drawdown. They are also interested in meeting with us on the issue of dry shipped condensing units.

Talk to you tomorrow.

David

The Alliance believes that a more aggressive approach should be considered, and encourages the Agency to adopt the more aggressive five-year allocation schedule for HCFC-22. This option is a five-year linear draw down beginning with 10,000 metric tons of HCFC-22 in 2015, which would result in the lowest allocations of any of the proposals in the first two years of the 2015-2019 period. The Alliance believes this early signal is important for an orderly market transition.

In December, 2011, the Alliance urged EPA "to use processes and tools available to it in order to obtain (appropriate production and stockpile) data." We commend the Agency for doing so in 2013 and believe that you now have sufficient data on this topic to inform this rulemaking. We encourage EPA to collect stockpile information as part of its routine annual reporting requirements for the remainder of the 2015-2019 period.

However, we also believe it is important that this allocation rule be completed promptly and do not want changes in the reporting requirements to slow the completion of the final allocation rule. If such were to be the case, we would recommend the reporting change, but as a separate administrative action.

In finalizing a decision on the allocations for the 2015-2019 period, it is important that adequate notice be provided in order to allow for the markets to adjust. This is an additional reason why the Alliance urges the Agency to move expeditiously and complete its proposal as quickly as possible.

On a cautionary note, as HCFC-22 allocations are declining, the user industries are experiencing more frequent occasions of problems with "substitutes" that are either unsafe, unsuitable, or contaminated, thereby harming the equipment relying on these refrigerants. It is important that the Agency utilize its authorities under SNAP and Section 608 in order to minimize this problem. We look forward to working with you on this challenge.

The Montreal Protocol and the Clean Air Act Title VI implementation have succeeded because they have allowed for long-term management principles in order to achieve the desired environmental policy objectives. This rule should ensure an adequate supply of HCFCs for existing equipment, but not an oversupply. The rule should also recognize the significant capacity for effective recovery, recycle and reclamation of this material and encourage greater product stewardship through leak reduction, product recovery and management. The inventory of HCFC-22 is substantial, and efforts should be made to ensure maximum reliance on these measures as an important means of servicing the existing equipment base, in addition to safe and reliable alternative refrigerants.

Finally, we believe that an update of the Agency vintage model should be conducted to include more current information on leak rates and charge size in order to better determine actual need over the next five to fifteen years for servicing the installed equipment base. Alliance members welcome the opportunity to work with EPA staff on this update.

The Alliance looks forward to working with the Agency in an expeditious manner to achieve rapid completion of this allocation rule.

Donaldson, David

From: Donaldson, David
Sent: Friday, January 31, 2014 5:22 PM
To: Rostker, David J.
Cc: Hall-Jordan, Luke; Whiteley, Elizabeth; Wood, Gil
Subject: Re: Next SBA Advocacy Environmental Roundtable - Friday, January 31, 2014 - We Welcome Topics for Future Roundtables

David,

Just wanted to thank you for hosting the roundtable today. I thought that the meeting went well, and will plan to follow-up with you next week.

Have a good weekend,
David

On Jan 14, 2014, at 10:44 AM, "Rostker, David J." <David.Rostker@sba.gov> wrote:

Thank you for agreeing to participate in our January 31 Roundtable. The attached email went out to our invitation list late Friday. Please feel free to distribute this broadly.

David Rostker | Assistant Chief Counsel | SBA Office of Advocacy | 409 3rd St. SW, Washington, DC 20416 | p 202/205-6966 | f 202/481-2605 | david.rostker@sba.gov | [website](#) | [News](#) | [Research](#) | [Regulation](#) | [blog](#) | [Facebook](#) | [twitter](#) |

From: Bromberg, Kevin L.
Sent: Friday, January 10, 2014 5:46 PM
To: Bromberg, Kevin L.
Subject: Next SBA Advocacy Environmental Roundtable - Friday, January 31, 2014 - We Welcome Topics for Future Roundtables

<image002.jpg>

Teleconference Number: 888-858-2144 Access Code: 9232939

*****SBA Environmental Roundtable Meeting*****
FRIDAY, January 31, 2014 10 a.m. – noon

TO: Interested Persons

FROM: Kevin Bromberg, Assistant Chief Counsel, Environment
David Rostker, Assistant Chief Counsel, Environment
Sarah Bresolin, Assistant Chief Counsel, Environment

SUBJECT: Next SBA Environmental Roundtable Meeting

The next U.S. Small Business Administration, Office of Advocacy Environmental Roundtable will meet to discuss the following topics, beginning at 10 a.m. on Friday, January 31, 2014. The meeting will be held in Washington, D.C., at the Small Business Administration Headquarters, 409 Third Street SW. Send RSVP to david.rostker@sba.gov. We have adopted a casual clothes option for all Roundtable meetings.

Draft Agenda

Proposed Adjustments to the Allowance System for Controlling HCFC Production, Import and Export for 2015 - 2019

David Donaldson, *Chief, Stratospheric Program Implementation Branch*
and Elizabeth Whiteley, *Environmental Scientist*
Stratospheric Protection Division, U.S.

EPA

Presentation

10:00 – 10:30

Discussion of Impacts on Small

Business

10:30 – 11:00

Proposed New Source Performance Standards for Residential Wood Heaters

Gil Wood, *Staff Lead for Development of the Residential Wood Heaters NSPS*
Office of Air Quality and Performance Standards, U.S. EPA

Presentation

11:00

– 11:30

Discussion of Impacts on Small

Business

11:30 – 12:00

Roundtable meetings are open to all interested persons, with the exception of the press, in order to facilitate open and frank discussion about the impacts of Federal regulatory activities on small entities. Agendas and presentations are available to all, including the press. Anyone who wants to receive roundtable agendas or presentations, or to be included in the distribution list, should forward such requests to kevin.bromberg@sba.gov. The purpose of these Roundtable meetings is to exchange opinions, facts and information and to obtain the attendees' individual views and opinions regarding small business concerns. The meetings are not intended to achieve or communicate any consensus positions of the attendees.

Small Business Environmental Roundtable
Issues for Discussion
January 31, 2014

Proposed Adjustments to the Allowance System for Controlling HCFC Production, Import and Export for 2015 - 2019

All developed countries are subject to caps on their consumption and production of hydrochlorofluorocarbons (HCFCs), according to the terms of the Montreal Protocol and its amendments. Under the Montreal Protocol, the U.S. and other developed nations must achieve a certain percentage of progress towards the total phaseout of production and consumption of HCFCs, by certain dates. In the U.S., EPA is charged with allocating production and consumption tradable credits of various types of HCFCs. Historically, the program has been managed to help foster HCFC replacements on the market, but recent court cases and regulatory amendments have increased the supply of HCFCs on the market and lowered prices, harming the replacement market.

On December 24, EPA published proposed allocations for calendar years 2015 through 2019. Comments are due by February 24. EPA certified that the rule will not have a significant economic effect on a substantial number of small entities, but some small businesses that operate in the HCFC replacement market seek relief from the currently lower HCFC prices and want EPA to more aggressively restrict supply of HCFCs and do it sooner.

Proposed New Source Performance Standards for Residential Wood Heaters

On January 3, EPA released this proposed rule revising the New Source Performance Standards for Residential Wood Heaters. (As of today, the rule has not yet appeared in the Federal Register, so the deadline for comments has not yet been set.) This rule was the subject of a lengthy SBREFA panel, and EPA conducted an Initial Regulatory Flexibility Analysis. EPA estimates that 90% of the manufacturers of Residential Wood Heaters are small entities. EPA states in its preamble:

“The economic impacts for industries affected by this proposed rule [over the 2014 through 2022 period] range from 4.3 percent for manufacture of wood heater/stove models to as much as an 6.4 percent compliance cost-to-sales estimate for manufacture of single burn rate wood heater models. These impacts do not presume any pass-through of impacts to consumers.”

Although EPA believes there are sufficient flexibilities in the rule, some trade associations are concerned that a significant number of small entities will not be able to comply in a timely fashion. However, there are some small businesses developing (and, in at least one case, selling) new residential wood heaters that are likely to meet the new standards and who welcome these more stringent standards.

Donaldson, David

From: Hufford, Drusilla
Sent: Wednesday, March 19, 2014 11:42 AM
To: Rogers, JoanB
Cc: Donaldson, David; Hall-Jordan, Luke; Krieger, Jackie
Subject: EPA Petition Response
Attachments: 3-13-14 Signed Letter to Peter Williams of new Era Group.pdf

Joan - I wanted to update you on the status of the HCFC issue we communicated about earlier. You are aware, I know, of the background: the 2014 allowances for HCFC-22 were made final in EPA's April 2013 rulemaking, and in June, EPA was petitioned to reconsider these allowances because petitioners - some small businesses who recycle and reclaim R-22 - believe that EPA allocated too much, and that this has hurt their businesses.

Staff met repeatedly with the petitioners, and in December we explained that since the petition raises no issue that could not have been raised during the comment period (the 2014 allocation number was within the range proposed) we'd likely deny it. That said, we assured them that we took their concerns into account in developing the next allocation rule, covering 2015-2019. As you also know, we then followed up with a Small Business Roundtable at SBA.

What is new is this: on February 27, Patton Boggs sent a Demand Letter on behalf of these small businesses threatening legal action if EPA failed to respond to their petition by March 14, 2014. Recognizing the value of providing more certainty to these petitioners, EPA responded to deny this petition last Friday. I have attached a copy of the petition denial. Let me know if you need more information.

Best,

Drusilla



THE ADMINISTRATOR OF THE ENVIRONMENTAL PROTECTION AGENCY

WASHINGTON, D.C. 20460

MAR 13 2014

Mr. Peter V. Williams
New Era Group
17 Grey Moss Road
Murrells Inlet, South Carolina 29576

Dear Mr. Williams:

The U.S. Environmental Protection Agency has considered the petition you submitted on June 3, 2013, asking the EPA to reconsider the April 3, 2013, final rule titled "Adjustments to the Allowance System for Controlling HCFC Production, Imports, and Exports" (78 Fed. Reg. 20004). The petition states that the "probable consequences" of the final rule are "[l]aunching an [a]dverse [e]nvironmental effect"; "[c]reating an inequitable [c]hemical [i]ndustry [m]arketplace in the U.S."; and providing a specified number of allowances to two foreign-based companies. Because the petition does not state grounds that satisfy the requirements of section 307(d)(7)(B) of the Clean Air Act, the EPA is denying the petition.

I. Background

On April 3, 2013, the EPA published a final rule allocating allowances for the production and consumption of HCFC-22, HCFC-142b and other HCFCs during the 2012, 2013 and 2014 control periods.

On June 3, 2013, you sent the EPA a petition requesting that the agency reconsider the April 3, 2013, rule pursuant to 307(d)(7)(B) of the act. The petition contains a list of nine objections to the final rule. In general, these objections appear to relate to the size of the HCFC-22 allocation and the existence of the HCFC-142b allocation. Some of the objections relate to the amount of allowances allocated to specific companies following the decision by the U.S. Court of Appeals for the District of Columbia. Circuit in *Arkema v. EPA*.

On February 27, 2014, your attorneys sent the EPA a letter that requested a response to the petition. This letter constitutes that response. While we take exception to some of the characterizations in the February 27, 2014, letter, we are not addressing that letter in detail here. We note, however, that the letter incorrectly asserts that during the development of the April 3, 2013, rule, the EPA possessed HCFC-22 inventory data that it "failed to provide [to] the public." The letter appears to be referring to inventory data submitted in response to requests made under section 114 of the Clean Air Act in 2013. However, the EPA did not send out the section 114 requests until August 8, 2013, well after the April 3, 2013, rule was final.

Other portions of the February 27, 2014, letter appear to relate to the December 24, 2013, notice of proposed rulemaking regarding the allocation of HCFC allowances for 2015-2019. We intend to treat

those portions of the February 27 letter as comments on the December 24, 2013, proposed rule and will add the letter to the docket for that rulemaking.

II. Standard for Reconsideration

Section 307(d)(7)(B) of the Clean Air Act states:

Only an objection to a rule or procedure which was raised with reasonable specificity during the period for public comment (including any public hearing) may be raised during judicial review. If the person raising an objection can demonstrate to the Administrator that it was impracticable to raise such objection within such time or if the grounds for such objection arose after the period for public comment (but within the time specified for judicial review) and if such objection is of central relevance to the outcome of the rule, the Administrator shall convene a proceeding for reconsideration of the rule and provide the same procedural rights as would have been afforded had the information been available at the time the rule was proposed. If the Administrator refuses to convene such a proceeding, such person may seek review of such refusal in the United States court of appeals for the appropriate circuit. Such reconsideration shall not postpone the effectiveness of the rule. The effectiveness of the rule may be stayed pending such reconsideration, however, by the Administrator or the court for a period not to exceed three months.

Thus, for reconsideration to be mandated, a petition for reconsideration must show why the objection or claim could not have been presented during the comment period – either because it was impracticable to raise the objection during that time or because the grounds for raising the objection arose after the period for public comment but within 60 days of publication of the final action, i.e., “the time specified for judicial review.” The petition must also show that the objection is of central relevance to the outcome of the rule. To be of central relevance to the outcome of a rule, an objection must provide substantial support for the argument that the promulgated regulation should be revised. *See* 76 Fed. Reg. 28318 (May 17, 2011) and other actions there cited.

III. Petition for Reconsideration

The petition does not explain why you could not have raised your objections to the HCFC-22 and HCFC-142b allowance allocations during the public-comment period, as section 307(d)(7)(B) requires. The EPA did not receive comments from you on the Notice of Proposed Rulemaking covering 2012-2014 HCFC allowances. The EPA took comment on a range of values for the HCFC-22 allowance allocation, including the value that was ultimately adopted in the final rule. *See* 77 Fed. Reg. at 242-243 and 77 Fed. Reg. at 245-254. The EPA received comments on the size of the HCFC-22 allowance allocation and the effect the timing of the rule could have on the market and responded to them in the final rule. *See* 78 Fed. Reg. at 20008-20020 and the Response to Comments document available at www.regulations.gov/#!documentDetail;D=EPA-HQ-OAR-2011-0354-0168. Similarly, the EPA took comment on the HCFC-142b allowance allocation (*see* 77 Fed. Reg. at 242-243 and 77 Fed. Reg. at 245-254) and received comments on both the specific amount of the allocation and the broader question of whether to allocate allowances for this chemical. *See* the Response to Comments document available at www.regulations.gov/#!documentDetail;D=EPA-HQ-OAR-2011-0354-0168.

The petition maintains that the consequences of the final rule arose after the close of the public-comment period. The petition lists three consequences: “[l]aunching an [a]dverse [e]nvironmental effect”;

“[c]reating an inequitable [c]hemical [i]ndustry [m]arketplace in the U.S.”; and providing a specified number of allowances to two foreign-based companies.

The concern regarding the environmental effect of the rule appears to be related to the allowance allocation and to the effects of that allocation on the reclamation industry. As discussed, the EPA took comment on the proposed allocations of HCFC-22 and HCFC-142b allowances and issued allowances in the final rule that were within the ranges described in the proposal. Any concerns regarding the environmental effects of the proposed allocation levels could have been raised during the public-comment period. In fact, numerous entities did submit comments on the environmental ramifications of the various options proposed, including the level of allowances provided and whether the EPA should provide recoupment allowances from the annual allocation or in addition to the annual allocation. See the Response to Comments document available at www.regulations.gov/#!documentDetail;D=EPA-HQ-OAR-2011-0354-0168.

In addition, the issue of how the allocation might affect the reclamation industry was clearly discussed during the rulemaking. For example, the preamble to the proposed rule stated that “a lower virgin supply will further incentivize recovery and reclamation” (77 Fed. Reg. at 247). Indeed, the EPA stated that it was proposing “to allocate fewer HCFC-22 consumption allowances than contemplated in the 2009 final Rule for 2012-2014 in order to promote recovery and reclamation and encourage transition to non-ODS alternatives.” (77 Fed. Reg. at 244).

While the petition identifies effects on the marketplace as arising after the close of the public-comment period, it nonetheless describes such effects as “foreseeable” and “probable.” It further states that “NEG and other members of the public could have probably predicted how the After-Effect of this Final Rule would turn the Refrigerant-gas Marketplace, upside down.” In fact, the EPA received and responded to at least 40 comments addressing market impacts. One example is a comment from Heating, Air-Conditioning and Refrigeration Distributors International who stated that “there would be significant financial harm and devaluation of inventory for distributors who purchased HCFC-22 during the interim guidance period,” if the EPA set the final allocation higher than at the level permitted by the non-enforcement letter. Several others commented on the effects the price and oversupply of HCFC-22 have on refrigerant sales and reclamation. See the Response to Comments document available at www.regulations.gov/#!documentDetail;D=EPA-HQ-OAR-2011-0354-0168.

Additionally, the petitioner and several companies represented by the petitioner submitted comments on market effects of the August 5, 2011, HCFC allowance-allocation rule (76 Fed. Reg. 47451) (“2011 Interim Final Rule”) and other past HCFC allowance-allocation rules. Comments submitted in response to the 2011 Interim Final Rule were considered and responded to in the development of the April 23, 2013, rule. See the Response to Comments document available at www.regulations.gov/#!documentDetail;D=EPA-HQ-OAR-2011-0354-0168. Comments like these encouraged the EPA to reduce the overall allocation between 2012 and 2014 by almost 30 percent relative to the 2009 final rule, which was partially vacated by the U.S. Court of Appeals for the District of Columbia Circuit in *Arkema v. EPA* (618 F.3d 1, D.C. Cir. 2010). Thus, there has been an ongoing dialogue between stakeholders, including the petitioner, and the EPA regarding the market effects of the HCFC allowance-allocation rules. There is no reason the petitioner could not have submitted comments on such effects during the public-comment period for the April 23, 2013, rule.

The third consequence listed in the petition is that two foreign-based companies received specified numbers of production and consumption allowances as well as recoupment allowances. The EPA

proposed and took comment on both baseline and calendar-year production and consumption allowances. *See* 77 Fed. Reg. at 245. In addition, the EPA proposed and took comment on recoupment allowances. *See* 77 Fed. Reg. at 248. The baseline, calendar-year and recoupment allowances in the final rule are all within the ranges described in the proposal. 77 Fed. Reg. 237. Thus, the allowance allocation to the two foreign-based companies that appears in the final rule did not arise after the close of the public-comment period.


The EPA has determined that all of the objections or claims raised in the petition could have been presented to the EPA during the rulemaking. Most if not all of the topics addressed in the petition were in fact raised by other commenters during the public-comment period.

IV. Conclusion

Because the petition does not state grounds requiring reconsideration under section 307(d)(7)(B), the EPA is denying the petition.

We appreciate your interest in this matter.

Sincerely,



Gina McCarthy

Donaldson, David

Subject: Meeting with Pete Williams of Williams and Associates and Ted Broudy and James Burke of USA Refrigerants
Location: DCRoom1310L1003p20PCTVPoly/DC-1310L-OAR
Start: Fri 11/1/2013 1:00 PM
End: Fri 11/1/2013 2:00 PM
Recurrence: (none)
Meeting Status: Meeting organizer
Organizer: Donaldson, David
Required Attendees: Donaldson, David; Patrick, Kimberly; Rogers, JoanB; Hufford, Drusilla; Hall-Jordan, Luke; Whiteley, Elizabeth; McConkey, Diane; jamesburkeusa@gmail.com; tedbroudy@usarefrigerants.com; williamsassocs@comcast.net
Optional Attendees: James, Mike
Resources: DCRoom1310L1003p20PCTVPoly/DC-1310L-OAR

Location:
1310 L Street N.W.
Room 1003
Washington, DC 20005

Contact:
David Donaldson
202-343-9086

Hall-Jordan, Luke

Subject: GreenChill Partner Roundtable: EPA's Proposed HCFC-22 Allocation for 2015-2019
Location: Roundtable

Start: Thu 2/27/2014 2:00 PM
End: Thu 2/27/2014 3:00 PM

Recurrence: (none)

Meeting Status: Accepted

Organizer: Joe Donahue

When: Thursday, February 27, 2014 2:00 PM-3:00 PM. (UTC-05:00) Eastern Time (US & Canada)
Where: Roundtable

~~*~*~*~*~*~*~*~*

Topic: EPA's Proposed HCFC-22 Allocation for 2015-2019

Date: Thursday, February 27, 2014
Time: 2:00 pm to 3:00 pm (Eastern time)

Description:

Please join us on Thursday February 27 at 2:00pm for a GreenChill partner roundtable discussion on the EPA's proposed HCFC allocation for 2015 through 2019. The roundtable will be an opportunity for GreenChill partners to hear from EPA staff about the proposed HCFC-22 allocation, learn about opportunities to comment on the proposed allocation, and ask questions. This roundtable will be open to all GreenChill partners.

To join the roundtable:

1. Go to https://epa.connectsolutions.com/hcfc_allocation/
2. Select "Enter as a Guest". It is important that you select the option to enter as a guest.
3. Enter your name.
4. Click "Enter Room".
5. Click "OK".

For audio

1. Call the toll free call-in number: 1-866-299-3188
2. Use Conference Code: 202 343 9185

Hall-Jordan, Luke

From: Friedman, Kristina
Sent: Wednesday, March 05, 2014 11:24 AM
To: Hall-Jordan, Luke
Cc: Mason, Colleen
Subject: FW: for HCFC allocation docket
Attachments: [Untitled].pdf

Hi Luke,

Not sure if you guys want this attendee list for your docket on 5570.

Thanks,
Kristina

-----Original Message-----

From: Knapp, Kristien
Sent: Wednesday, February 26, 2014 4:20 PM
To: Mason, Colleen; Friedman, Kristina
Subject: FW: for HCFC allocation docket

-----Original Message-----

From: EZTech_Printer [mailto:EZTek@epa.gov]
Sent: Wednesday, February 26, 2014 4:19 PM
To: Knapp, Kristien
Subject:

Please open the attached document. This document was digitally sent to you using an HP Digital Sending device.

Meet with Norman Caffey, Patton Boggs LLP | Conference Room 5415

HCFC
ALLOCATION
NPRM

[illegible]

Hall-Jordan, Luke

Subject: FMI Lunch
Location: Crystal City

Start: Tue 3/11/2014 1:00 PM
End: Tue 3/11/2014 2:00 PM

Recurrence: (none)

Organizer: Hufford, Drusilla

Hall-Jordan, Luke

Subject: Call Steve van Maren

Start: Mon 3/24/2014 4:00 PM
End: Mon 3/24/2014 4:15 PM

Recurrence: (none)

Meeting Status: Meeting organizer

Organizer: Hall-Jordan, Luke
Required Attendees: Whiteley, Elizabeth; Donaldson, David

Hall-Jordan, Luke

Subject: EPA Honeywell meeting on HCFC allocation rule
Location: DCRoom1310L1003p20PCTVPoly/DC-1310L-OAR

Start: Thu 3/6/2014 11:00 AM
End: Thu 3/6/2014 12:00 PM

Recurrence: (none)

Meeting Status: Accepted

Organizer: Donaldson, David
Required Attendees: Hufford, Drusilla; Hall-Jordan, Luke; Whiteley, Elizabeth; Stirpe, Dave
Optional Attendees: McConkey, Diane

Hall-Jordan, Luke

Subject: Call with Summit Refrigerants
Location: DCRoom1310L1003p20PCTVPoly/DC-1310L-OAR

Start: Thu 4/24/2014 3:00 PM
End: Thu 4/24/2014 4:00 PM

Recurrence: (none)

Meeting Status: Meeting organizer

Organizer: Hall-Jordan, Luke
Required Attendees: Whiteley, Elizabeth; Donaldson, David; Hamlin, Sally
Resources: DCRoom1310L1003p20PCTVPoly/DC-1310L-OAR

Steve Trevino, Summit Refrigerants, would like to speak with us about what he's seeing in Texas, re: HCFC-22 market and reclamation.

Hall-Jordan, Luke

Subject: Hold for EPA Hudson teleconference on HCFC allocation rule
Location: Call from my office

Start: Thu 3/6/2014 9:00 AM
End: Thu 3/6/2014 10:00 AM

Recurrence: (none)

Meeting Status: Accepted

Organizer: Donaldson, David
Required Attendees: Hall-Jordan, Luke; Whiteley, Elizabeth; Benjamin Klein
Optional Attendees: Brian Coleman

Hall-Jordan, Luke

Subject: 2014 HVACR & Mechanical Conference - Session from 10:15-11:45
Location: Conference Center @the Maritime Institute, Baltimore, MD

Start: Tue 3/4/2014 8:00 AM
End: Tue 3/4/2014 3:00 PM

Recurrence: (none)

Organizer: Hall-Jordan, Luke

Topics to cover at our session:

- 608, (609?)
- R-22 and General Update
- Unapproved refrigerants
- Refrigerant mixing

We'll also have a table and can display information in the conference hall.

Hall-Jordan, Luke

Subject: Confirmed: Phone call with Watsco re: 2015-2019 HCFC Rule
Location: DHO (with call in line)
Start: Fri 2/21/2014 10:00 AM
End: Fri 2/21/2014 11:00 AM
Recurrence: (none)
Meeting Status: Accepted
Organizer: Whiteley, Elizabeth
Required Attendees: Donaldson, David; Hall-Jordan, Luke; Hufford, Drusilla

Conversation with Carole Poindexter at Watsco to hear their thoughts on the 2015-2019 HCFC Allocation Rule. We can all meet in Drusilla's office, Watsco will be calling in.

Hall-Jordan, Luke

Subject: Confirmed EPA DuPont meeting to discuss proposed 15-19 HCFC allocation rule
Location: DCRoom1310L1003p20PCTVPoly/DC-1310L-OAR

Start: Fri 2/21/2014 1:00 PM
End: Fri 2/21/2014 2:00 PM

Recurrence: (none)

Meeting Status: Accepted

Organizer: Donaldson, David
Required Attendees: Hufford, Drusilla; Hall-Jordan, Luke; Whiteley, Elizabeth; Godwin, Dave;
Michael.S.Parr@dupont.com; James.E.Bachman@dupont.com
Optional Attendees: Newberg, Cindy; McConkey, Diane

Location:
1310 L St., NW
Rm # 1003
WASHINGTON, DC 20005

Contact:
David Donaldson
Desk: 202-343-9086
Mobile: 202-604-2207

Hall-Jordan, Luke

Subject: Call Nathan

Start: Thu 2/20/2014 4:30 PM
End: Thu 2/20/2014 5:00 PM

Recurrence: (none)

Meeting Status: Meeting organizer

Organizer: Hall-Jordan, Luke
Required Attendees: Donaldson, David

Hall-Jordan, Luke

Subject: Meeting with Arkema
Location: DCRoom1310L1003p20PCTVPoly/DC-1310L-OAR
Start: Wed 2/19/2014 10:00 AM
End: Wed 2/19/2014 11:00 AM
Recurrence: (none)
Meeting Status: Meeting organizer
Organizer: Hall-Jordan, Luke
Required Attendees: Whiteley, Elizabeth; Donaldson, David; Hufford, Drusilla
Optional Attendees: Newberg, Cindy; Godwin, Dave
Resources: DCRoom1310L1003p20PCTVPoly/DC-1310L-OAR

Talk through comments on 2015-19 HCFC Rule and market trends for HCFC market

Attending: Matt Ritter, Gary Dee and/or Glenn Haun, David Kunz, Bill Hamel

Hall-Jordan, Luke

Subject: Meeting with Caffey Norman of Patton Boggs regarding the HCFC allocation
Location: DCRoom1310L1003p20PCTVPoly/DC-1310L-OAR
Start: Thu 2/6/2014 11:00 AM
End: Thu 2/6/2014 12:00 PM
Recurrence: (none)
Meeting Status: Accepted
Organizer: Donaldson, David
Required Attendees: Hufford, Drusilla; Whiteley, Elizabeth; Hall-Jordan, Luke; McConkey, Diane; CNorman@PattonBoggs.com; Addison, Daniel; Foehrkolb, Kristina

Location:
1310 L St., NW
Rm # 1003
Washington, DC 20005

Contact:
David Donaldson
Desk: 202-343-9086
Cell: 202-604-2207

Please be sure to bring your photo ID in order to clear building security.

Hall-Jordan, Luke

Subject: Call Ted Atwood
Location: DCRoom1310L1032p6DirTB/DC-1310L-OAR
Start: Mon 2/3/2014 3:00 PM
End: Mon 2/3/2014 3:30 PM
Recurrence: (none)
Meeting Status: Meeting organizer
Organizer: Hall-Jordan, Luke
Required Attendees: Whiteley, Elizabeth
Resources: DCRoom1310L1032p6DirTB/DC-1310L-OAR

Hall-Jordan, Luke

Subject: SBA Roundtable
Location: Small Business Administration Headquarters, 409 Third Street SW
Start: Fri 1/31/2014 9:00 AM
End: Fri 1/31/2014 12:00 PM
Recurrence: (none)
Meeting Status: Meeting organizer
Organizer: Hall-Jordan, Luke
Required Attendees: Whiteley, Elizabeth; Donaldson, David; Hufford, Drusilla

I've built in more than enough time for travel. We go on at 10, ending at 11.

Hall-Jordan, Luke

Subject: Meeting with Rheem
Location: DCRoom1310L1003p20PCTVPoly/DC-1310L-OAR

Start: Thu 1/30/2014 4:00 PM
End: Thu 1/30/2014 5:00 PM

Recurrence: (none)

Meeting Status: Meeting organizer

Organizer: Hall-Jordan, Luke
Required Attendees: Donaldson, David; Whiteley, Elizabeth
Optional Attendees: Hufford, Drusilla
Resources: DCRoom1310L1003p20PCTVPoly/DC-1310L-OAR

Rheem folks will be in town and are able to speak with us about dry-shipped condensing units and the allocation rule.

Hall-Jordan, Luke

Subject: NTAA call
Location: DCRoom1310L756p20PCPoly/DC-1310L-OAR
Start: Thu 1/30/2014 2:00 PM
End: Thu 1/30/2014 3:00 PM
Recurrence: (none)
Meeting Status: Accepted
Organizer: Wilson, Erika
Required Attendees: Whiteley, Elizabeth; Hall-Jordan, Luke; Hyland, Dana; Bollerud, Erica

*National Tribal Air Association
NTAA- EPA Air Policy Call Agenda
January 30, 2014*



ATT63927 1.jpg



ATT03541 2.jpg

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so everyone can view presentations if we have them –
To view, please register here.**

If you have not used GoToWebinar in the past, please take a few minutes before the call starts to download the necessary software and to register in order to be able to view documents discussed on the call here:
<https://attendee.gotowebinar.com/register/7859557960499030529>

**Call Time: (10 AM Alaska, 11 AM Pacific, 12 Noon Mountain,
1 PM Central, 2 PM Eastern)**

Call Agenda:

1. EPA Air Updates – (OAR, OAQPS, OTAQ, ORIA, OAP)

A. Title: OAR's Climate Change Adaptation Implementation Plan

Presenter: Dana Hyland (OAP) & Lourdes Morales (OAQPS). **Time:** 15 Minutes

Description: In November 2013, EPA released 17 *Program and Regional Adaptation Implementation Plans* as part of an ongoing effort to address adaptation across the federal government. The draft *Implementation Plans* provide detailed information about the actions EPA plans to take across the country to help communities adapt to a changing climate and

recognize that EPA must integrate climate adaptation planning into its programs, policies, rules, and operations to ensure that the Agency's work continues to be effective even as the climate changes.

B. Title: Tribal Greenhouse Gas Inventory Tool – beta version

Presenter: Erica Bollerud (OAP). Time: 5 minutes (including Q&A)

Description: EPA has developed a free tool designed to help tribes evaluate greenhouse gas emissions from their entire community or from tribal government operations. In beta version, this interactive tool helps tribes calculate GHG emissions from residential, commercial, transportation, and waste and wastewater management sectors.

C. Title: Proposed HCFC production rule (“Protection of Stratospheric Ozone: Adjustments to the Allowance System for Controlling HCFC Production, Import and Export”)

Presenter: Liz Whiteley (OAP). Time: 10

Description: EPA is proposing to adjust the allowance system in order to reduce the U.S. consumption and production of ozone-depleting substances known as hydro chlorofluorocarbons (HCFCs). HCFCs contribute to ozone depletion and this rulemaking would implement the next phase down step under The Montreal Protocol on Substances that Deplete the Ozone Layer. Protection of the stratospheric ozone layer helps reduce rates of skin cancer and cataracts.

D. Title: Proposed NSPS Revision for Residential Wood Heaters

Presenter: Gil Wood (OAQPS). Time: 10 minutes

Description: This is an overview of the proposed updates to the New Source Performance Standards for Residential Wood Heaters. The updates are designed to make new residential wood heaters significantly cleaner, beginning in 2015. The proposed updates would strengthen the emissions standards for new wood stoves, while establishing federal air standards for other new wood heaters, including outdoor and indoor wood-fired hydronic heaters, **forced-air furnaces** and masonry heaters. The proposal would not affect existing woodstoves and other wood-burning heaters currently in use in people's homes. **The proposal would not affect heaters fueled solely by gas, oil or coal.**

2. NTAA Updates - Bill Thompson. Time: 10 minutes

1. Report from In-Person Meeting
2. Status of Tribal Air Report Revision Update

***The next NTAA/EPA Policy call will be on
February 27, 2014 at 12:00 Noon Mountain Time***

Hall-Jordan, Luke

Subject: HCFC Allocation Proposed Rule Public Hearing
Location: DCRoom1310L152PCTBCLTrng/DC-1310L-OAR;
DCRoom1310L154PCTBCLTrng/DC-1310L-OAR

Start: Thu 1/23/2014 12:00 PM
End: Thu 1/23/2014 6:00 PM

Recurrence: (none)

Meeting Status: Accepted

Organizer: Donaldson, David
Required Attendees: Hall-Jordan, Luke; Whiteley, Elizabeth

Hall-Jordan, Luke

Subject: Call with NRDC

Location: DHO

Start: Wed 1/22/2014 11:30 AM

End: Wed 1/22/2014 12:00 PM

Recurrence: (none)

Meeting Status: Meeting organizer

Organizer: Hall-Jordan, Luke

Required Attendees: Hufford, Drusilla; Donaldson, David; Whiteley, Elizabeth

Hall-Jordan, Luke

Subject: FW: phone briefing on proposed HCFC-22 allocation rule for 2015-2019 (EPA briefing for HEC minority staff)

Start: Thu 1/16/2014 2:00 PM
End: Thu 1/16/2014 3:00 PM

Recurrence: (none)

Meeting Status: Accepted

Organizer: Mackay, Cheryl

-----Original Appointment-----

From: Mackay, Cheryl

Sent: Wednesday, January 08, 2014 10:48 AM

To: Mackay, Cheryl; Hufford, Drusilla; Donaldson, David; Baran, Jeff; Teitz, Alexandra; Dotson, Greg

Cc: Lewis, Josh

Subject: phone briefing on proposed HCFC-22 allocation rule for 2015-2019 (EPA briefing for HEC minority staff)

When: Thursday, January 16, 2014 2:00 PM-3:00 PM (GMT-05:00) Eastern Time (US & Canada).

Hall-Jordan, Luke

Subject: confirmed: phone discussion with Senate staff (Murphy, EPW Committee, Coons and Gillibrand) regarding the proposed HCFC-22 allocations

Start: Thu 12/19/2013 11:30 AM
End: Thu 12/19/2013 12:00 PM

Recurrence: (none)

Meeting Status: Accepted

Organizer: Haman, Patricia
Required Attendees: Hufford, Drusilla; Hall-Jordan, Luke; Donaldson, David; Whiteley, Elizabeth

Hall-Jordan, Luke

Subject: Proposed 2015-19 HCFC allocation rule
Location: conference call

Start: Fri 12/13/2013 11:00 AM
End: Fri 12/13/2013 12:00 PM

Recurrence: (none)

Meeting Status: Accepted

Organizer: Donaldson, David
Required Attendees: Rostker, David J.; Hall-Jordan, Luke; Whiteley, Elizabeth

Hall-Jordan, Luke

Subject: Confirmed: Pete Williams call, re: 2014

Start: Fri 12/6/2013 1:30 PM
End: Fri 12/6/2013 2:00 PM

Recurrence: (none)

Meeting Status: Meeting organizer

Organizer: Hall-Jordan, Luke
Required Attendees: McConkey, Diane; Donaldson, David; Whiteley, Elizabeth

Hall-Jordan, Luke

Subject: Meeting with Jeff Cohen, EOS Climate, re: R-22
Location: DCRoom1310L1003p20PCTVPoly/DC-1310L-OAR
Start: Wed 11/20/2013 2:30 PM
End: Wed 11/20/2013 3:30 PM
Recurrence: (none)
Meeting Status: Meeting organizer
Organizer: Hall-Jordan, Luke
Required Attendees: Donaldson, David; Whiteley, Elizabeth; jeff cohen
Optional Attendees: Hamlin, Sally; Godwin, Dave
Resources: DCRoom1310L1003p20PCTVPoly/DC-1310L-OAR

Jeff wants to talk with us about some projects they are working on. Excerpt from his note:

“We are working with multiple industry players, including system owners, wholesalers/distributors, service technicians, and the producers, to improve how refrigerants are managed across their lifecycle. We wanted to share with you our approach and how we see the market trending under different regulatory scenarios.”

Hall-Jordan, Luke

Subject: E.O. 12866 Meeting on Protection of Stratospheric Ozone: Adjustments to the Allowance System for Controlling HCFC Production, Import, and Export for 2015-2019

Location: Room 9104 New Executive Office Building

Start: Wed 11/20/2013 4:00 PM

End: Wed 11/20/2013 4:30 PM

Recurrence: (none)

Meeting Status: Accepted

Organizer: Echols, Mabel E.

This meeting was requested by Jeff Cohen, EOS Climate Inc.

Call-in: 202-395-6392; code 3862485.

Hall-Jordan, Luke

Subject: Meeting with HARDI
Location: DCRoom1310L1003p20PCTVPoly/DC-1310L-OAR
Start: Thu 11/14/2013 3:00 PM
End: Thu 11/14/2013 4:00 PM
Recurrence: (none)
Meeting Status: Meeting organizer
Organizer: Hall-Jordan, Luke
Required Attendees: Donaldson, David; Whiteley, Elizabeth
Resources: DCRoom1310L1003p20PCTVPoly/DC-1310L-OAR

Hall-Jordan, Luke

Subject: E.O. 12866 Meeting on Protection of Stratospheric Ozone: Adjustments to the Allowance System for Controlling HCFC Production, Import, and Export for 2015-2019

Location: Room 9104 New Executive Office Building

Start: Thu 11/14/2013 2:00 PM

End: Thu 11/14/2013 2:30 PM

Recurrence: (none)

Meeting Status: Accepted

Organizer: Echols, Mabel E.

This meeting was requested by Jon Melchi, HARDI.

Call-in: 202-395-6392; code 3862485.

Hall-Jordan, Luke

Subject: Meeting with Kate Adams, Honeywell's Global Head of Legal and Govt. Relations re: HCFC 22 Rule (Confirmed)
Location: WJC-N 5400
Start: Tue 11/12/2013 12:30 PM
End: Tue 11/12/2013 1:00 PM
Recurrence: (none)
Meeting Status: Accepted
Organizer: McCabe, Janet
Required Attendees: Dunham, Sarah; Hufford, Drusilla; Donaldson, David; Hall-Jordan, Luke
Optional Attendees: Goffman, Joseph

To: McCabe, Janet; Dunham, Sarah; Hufford, Drusilla; Donaldson, David; Hall-Jordan, Luke; Goffman, Joe
Outside Organization Attendees: Katherine Adams, Amy Chaing, Ken Gayer and Maribel Wilson



FW: 22 Rule



Confirmed:
Meeting with Ja...



RE: Confirmed:
Meeting with Ja...



Outside visitors
for Janet McC...



RE: Confirmed:
Meeting with Ja...

Hall-Jordan, Luke

From: Atkinson, Emily
Sent: Tuesday, October 29, 2013 1:30 PM
To: Chiang, Amy
Cc: Hufford, Drusilla
Subject: Confirmed: Meeting with Janet McCabe on 11/12 at 12:30pm re: 22 Rule

Amy,

You are confirmed for a 30 minute meeting on Tuesday, November 12, 2013 at 12:30pm with Janet McCabe.

A list of all attendees should be submitted to me via email no later than 3:00pm on Wednesday, November 6 so I can provide it to our security officers who will screen you upon arrival.

Directions and procedures:

Metro: If you come by Metro get off at the Federal Triangle metro stop. Exit the metro station and go up two sets of escalators to the surface level and turn right. You will see a short staircase and wheelchair ramp leading to a set of glass doors with the EPA logo - that is the William Jefferson Clinton North building.

Taxi: Direct the taxi to drop you off on 12th Street NW, between Constitution and Pennsylvania Avenues, at the elevator for the Federal Triangle metro stop - this is almost exactly half way between the two avenues on 12th Street NW. Facing the building with the EPA logo and American flags, walk toward the building and take the glass door on your right hand side with the escalators going down to the metro on your left – that is the North Lobby of the William Jefferson Clinton building.

Security Procedures: A government issued photo id is required to enter the building and it is suggested you arrive 15 minutes early in order to be cleared and arrive at the meeting room on time. Upon entering the lobby, the meeting attendees will be asked to pass through security and provide a photo ID for entrance. Let the guards know that you were instructed to call 202-564-7400 for a security escort.

Please confirm receipt of the message and feel free to contact me should you need any additional information.

Emily

Emily Atkinson
Staff Assistant
Immediate Office of the Acting Assistant Administrator Office of Air and Radiation, USEPA
Voice: 202-564-1850

-----Original Message-----

From: Chiang, Amy [mailto:Amy.Chiang@Honeywell.com]
Sent: Tuesday, October 29, 2013 12:32 PM
To: Atkinson, Emily
Cc: Hufford, Drusilla
Subject: Re: Meeting with Janet McCabe on 11/12 re: 22 Rule

Perfect! Can you please send logistical details and let me know who else will be attending. I'll send you our attendees as well.

Looking forward to it.

Amy

----- Original Message -----

From: Atkinson, Emily [mailto:Atkinson.Emily@epa.gov]
Sent: Tuesday, October 29, 2013 12:12 PM
To: Chiang, Amy
Cc: Hufford, Drusilla <Hufford.Drusilla@epa.gov>
Subject: RE: Meeting with Janet McCabe on 11/12 re: 22 Rule

Amy,

We could make 12:30 - 1:00pm work. Let me know if this could work on your end.

Emily

Emily Atkinson
Staff Assistant
Immediate Office of the Acting Assistant Administrator Office of Air and Radiation, USEPA
Voice: 202-564-1850

-----Original Message-----

From: Chiang, Amy [mailto:Amy.Chiang@Honeywell.com]
Sent: Tuesday, October 29, 2013 11:44 AM
To: Atkinson, Emily
Cc: Hufford, Drusilla
Subject: Re: Meeting with Janet McCabe on 11/12 re: 22 Rule

Emily,

Thank you. Would there be any way to meet earlier in the day--perhaps around noon? If not, I will check on 4:30pm timing.

Thanks,
Amy

----- Original Message -----

From: Atkinson, Emily [mailto:Atkinson.Emily@epa.gov]
Sent: Tuesday, October 29, 2013 10:40 AM
To: Chiang, Amy
Cc: Hufford, Drusilla <Hufford.Drusilla@epa.gov>
Subject: Meeting with Janet McCabe on 11/12 re: 22 Rule

Hi Amy,

Janet McCabe is available for a 30 minute meeting on Tuesday, 11/12 at 4:30pm. Let me know if this date/time could work for you.

Thanks.

Emily

Emily Atkinson

Staff Assistant

Immediate Office of the Acting Assistant Administrator Office of Air and Radiation, USEPA

Voice: 202-564-1850

-----Original Message-----

From: Chiang, Amy [mailto:Amy.Chiang@Honeywell.com]

Sent: Monday, October 21, 2013 2:15 PM

To: McCabe, Janet

Cc: Hufford, Drusilla

Subject: 22 Rule

Janet,

I hope all is well. Kate Adams, Honeywell's Global Head of Legal and Government Relations was hoping to meet with you to present our views on the upcoming HCFC 22 Rule. We have been in to see your team and they have definitely taken the time to listen, but wanted a chance to update you as well. Would you be available on November 12th anytime after 11:30am?

Many thanks,

Amy

Hall-Jordan, Luke

From: Atkinson, Emily
Sent: Wednesday, October 30, 2013 10:16 AM
To: Chiang, Amy
Cc: Hufford, Drusilla
Subject: RE: Confirmed: Meeting with Janet McCabe on 11/12 at 12:30pm re: 22 Rule

Thanks Amy! We look forward to seeing you all on November 12.

Emily Atkinson
Staff Assistant
Immediate Office of the Acting Assistant Administrator Office of Air and Radiation, USEPA
Voice: 202-564-1850

-----Original Message-----

From: Chiang, Amy [mailto:Amy.Chiang@Honeywell.com]
Sent: Wednesday, October 30, 2013 10:01 AM
To: Atkinson, Emily
Cc: Hufford, Drusilla
Subject: RE: Confirmed: Meeting with Janet McCabe on 11/12 at 12:30pm re: 22 Rule

Emily,

Attendees from Honeywell are:

Katherine Adams
Ken Gayer
Lincoln Germain
Amy Chiang

If there are any changes, I will promptly notify you. Thank you again!

-----Original Message-----

From: Atkinson, Emily [mailto:Atkinson.Emily@epa.gov]
Sent: Tuesday, October 29, 2013 1:30 PM
To: Chiang, Amy
Cc: Hufford, Drusilla
Subject: Confirmed: Meeting with Janet McCabe on 11/12 at 12:30pm re: 22 Rule

Amy,

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Emily

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Staff Assistant
Immediate Office of the Acting Assistant Administrator Office of Air and Radiation, USEPA
Voice: 202-564-1850

-----Original Message-----

From: Chiang, Amy [mailto:Amy.Chiang@Honeywell.com]
Sent: Tuesday, October 29, 2013 12:32 PM
To: Atkinson, Emily
Cc: Hufford, Drusilla
Subject: Re: Meeting with Janet McCabe on 11/12 re: 22 Rule

Perfect! Can you please send logistical details and let me know who else will be attending. I'll send you our attendees as well.

Looking forward to it.

Amy

----- Original Message -----

From: Atkinson, Emily [mailto:Atkinson.Emily@epa.gov]
Sent: Tuesday, October 29, 2013 12:12 PM
To: Chiang, Amy
Cc: Hufford, Drusilla <Hufford.Drusilla@epa.gov>
Subject: RE: Meeting with Janet McCabe on 11/12 re: 22 Rule

Amy,

We could make 12:30 - 1:00pm work. Let me know if this could work on your end.

Emily

Emily Atkinson
Staff Assistant
Immediate Office of the Acting Assistant Administrator Office of Air and Radiation, USEPA
Voice: 202-564-1850

-----Original Message-----

From: Chiang, Amy [mailto:Amy.Chiang@Honeywell.com]
Sent: Tuesday, October 29, 2013 11:44 AM
To: Atkinson, Emily
Cc: Hufford, Drusilla
Subject: Re: Meeting with Janet McCabe on 11/12 re: 22 Rule

Emily,

Thank you. Would there be any way to meet earlier in the day--perhaps around noon? If not, I will check on 4:30pm timing.

Thanks,
Amy

----- Original Message -----

From: Atkinson, Emily [mailto:Atkinson.Emily@epa.gov]
Sent: Tuesday, October 29, 2013 10:40 AM
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Subject: Meeting with Janet McCabe on 11/12 re: 22 Rule

Hi Amy,

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Thanks.
Emily

Emily Atkinson
Staff Assistant
Immediate Office of the Acting Assistant Administrator Office of Air and Radiation, USEPA
Voice: 202-564-1850

-----Original Message-----

From: Chiang, Amy [mailto:Amy.Chiang@Honeywell.com]
Sent: Monday, October 21, 2013 2:15 PM
To: McCabe, Janet
Cc: Hufford, Drusilla
Subject: 22 Rule

Janet,

I hope all is well. Kate Adams, Honeywell's Global Head of Legal and Government Relations was hoping to meet with you to present our views on the upcoming HCFC 22 Rule. We have been in to see your team and they have definitely taken

the time to listen, but wanted a chance to update you as well. Would you be available on November 12th anytime after 11:30am?

Many thanks,
Amy

Hall-Jordan, Luke

From: Atkinson, Emily
Sent: Wednesday, October 30, 2013 10:18 AM
To: Bellerose, William; Stewart, JamesL
Subject: Outside visitors for Janet McCabe on 11/12 at 12:30pm

Dear Mr. Bellerose and Mr. Stewart,

Janet McCabe will be meeting with visitors from an outside organization on Tuesday, November 12, 2013 at 12:30pm.

Katherine Adams
Ken Gayer
Lincoln Germain
Amy Chiang

They will be meeting in WJCN 5400. Please call 564-7400 for an escort.

Thanks!
Emily

Emily Atkinson
Staff Assistant
Immediate Office of the Assistant Administrator
Office of Air and Radiation, USEPA
Room 5406B, 1200 Pennsylvania Avenue NW
Washington, DC 20460
Voice: 202-564-1850
Email: atkinson.emily@epa.gov

Hall-Jordan, Luke

From: Chiang, Amy <Amy.Chiang@Honeywell.com>
Sent: Monday, November 04, 2013 5:02 PM
To: Chiang, Amy; Atkinson, Emily
Cc: Hufford, Drusilla
Subject: RE: Confirmed: Meeting with Janet McCabe on 11/12 at 12:30pm re: 22 Rule

Emily,

Slight change in attendees. Please see below.

Attendees from Honeywell are:

Katherine Adams
Ken Gayer
Maribel Wilson
Amy Chiang

-----Original Message-----

From: Chiang, Amy
Sent: Wednesday, October 30, 2013 10:01 AM
To: 'Atkinson, Emily'
Cc: Hufford, Drusilla
Subject: RE: Confirmed: Meeting with Janet McCabe on 11/12 at 12:30pm re: 22 Rule

Emily,

Attendees from Honeywell are:

Katherine Adams
Ken Gayer
Lincoln Germain
Amy Chiang

If there are any changes, I will promptly notify you. Thank you again!

-----Original Message-----

From: Atkinson, Emily [mailto:Atkinson.Emily@epa.gov]
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Please confirm receipt of the message and feel free to contact me should you need any additional information.

Emily

Emily Atkinson

Staff Assistant

Immediate Office of the Acting Assistant Administrator Office of Air and Radiation, USEPA

Voice: 202-564-1850

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Cc: Hufford, Drusilla

Subject: Re: Meeting with Janet McCabe on 11/12 re: 22 Rule

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Looking forward to it.

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Sent: Tuesday, October 29, 2013 12:12 PM

To: Chiang, Amy

Cc: Hufford, Drusilla <Hufford.Drusilla@epa.gov>

Subject: RE: Meeting with Janet McCabe on 11/12 re: 22 Rule

Amy,

We could make 12:30 - 1:00pm work. Let me know if this could work on your end.

Emily

Emily Atkinson

Staff Assistant

Immediate Office of the Acting Assistant Administrator Office of Air and Radiation, USEPA

Voice: 202-564-1850

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From: Chiang, Amy [mailto:Amy.Chiang@Honeywell.com]

Sent: Tuesday, October 29, 2013 11:44 AM

To: Atkinson, Emily

Cc: Hufford, Drusilla

Subject: Re: Meeting with Janet McCabe on 11/12 re: 22 Rule

Emily,

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Amy

----- Original Message -----

From: Atkinson, Emily [mailto:Atkinson.Emily@epa.gov]

Sent: Tuesday, October 29, 2013 10:40 AM

To: Chiang, Amy

Cc: Hufford, Drusilla <Hufford.Drusilla@epa.gov>

Subject: Meeting with Janet McCabe on 11/12 re: 22 Rule

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Thanks.

Emily

Emily Atkinson

Staff Assistant

Immediate Office of the Acting Assistant Administrator Office of Air and Radiation, USEPA

Voice: 202-564-1850

-----Original Message-----

From: Chiang, Amy [mailto:Amy.Chiang@Honeywell.com]

Sent: Monday, October 21, 2013 2:15 PM

To: McCabe, Janet

Cc: Hufford, Drusilla

Subject: 22 Rule

Janet,

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Many thanks,
Amy

Hall-Jordan, Luke

Subject: E.O. 12866 Meeting on Protection of Stratospheric Ozone: Adjustments to the Allowance System for Controlling HCFC Production, Import, and Export for 2015-2019

Location: Room 10103 New Executive Office Building

Start: Tue 11/12/2013 11:45 AM

End: Tue 11/12/2013 12:15 PM

Recurrence: (none)

Meeting Status: Accepted

Organizer: Echols, Mabel E.

This meeting was requested by David Kunz, Arkema.

Call-in: 202-395-6392; code 3862485.

Hall-Jordan, Luke

Subject: Meeting with Pete Williams of Williams and Associates and Ted Broudy and James Burke of USA Refrigerants
Location: DCRoom1310L1003p20PCTVPoly/DC-1310L-OAR
Start: Fri 11/1/2013 1:00 PM
End: Fri 11/1/2013 2:00 PM
Recurrence: (none)
Meeting Status: Accepted
Organizer: Donaldson, David
Required Attendees: Patrick, Kimberly; Rogers, JoanB; Hufford, Drusilla; Hall-Jordan, Luke; Whiteley, Elizabeth; McConkey, Diane; jamesburkeusa@gmail.com; tedbroudy@usarefrigerants.com; williamsassoc@comcast.net

Location:
1310 L Street N.W.
Room 1003
Washington, DC 20005

Contact:
David Donaldson
202-343-9086

Hall-Jordan, Luke

Subject: E.O. 12866 Meeting on Protection of Stratospheric Ozone: Adjustments to the Allowance System for Controlling HCFC Production, Import, and Export for 2015-2019

Location: Room 10103 New Executive Office Building

Start: Wed 10/30/2013 2:00 PM

End: Wed 10/30/2013 2:30 PM

Recurrence: (none)

Meeting Status: Accepted

Organizer: Echols, Mabel E.

This meeting was requested by David Doniger, Natural Resources Defense Council.

Call-in: 202-395-6392; code 3862485.

Hall-Jordan, Luke

Subject: Call with Matt of Arkema.
Location: David's office

Start: Mon 10/28/2013 1:00 PM
End: Mon 10/28/2013 1:30 PM

Recurrence: (none)

Meeting Status: Accepted

Organizer: Donaldson, David

Required Attendees: Hall-Jordan, Luke

Hall-Jordan, Luke

Subject: HARDI Meeting

Start: Mon 10/7/2013 4:30 PM
End: Mon 10/7/2013 5:30 PM

Recurrence: (none)

Meeting Status: Meeting organizer

Organizer: Hall-Jordan, Luke
Required Attendees: Donaldson, David; Whiteley, Elizabeth

Hall-Jordan, Luke

Subject: E.O. 12866 Meeting on Protection of Stratospheric Ozone: Adjustments to the Allowance System for Controlling HCFC Production, Import, and Export for 2015-2019

Location: Room 10103 New Executive Office Building

Start: Mon 10/7/2013 11:00 AM

End: Mon 10/7/2013 11:30 AM

Recurrence: (none)

Meeting Status: Accepted

Organizer: Echols, Mabel E.

This teleconference was requested by Carole Poindexter, Watsco, Inc.

Call-in: 202-395-6392; code 3862485.

Hall-Jordan, Luke

Subject: E.O. 12866 Meeting on Protection of Stratospheric Ozone: Adjustments to the Allowance System for Controlling HCFC Production, Import, and Export for 2015-2019

Location: Room 10103 New Executive Office Building

Start: Thu 9/26/2013 2:30 PM

End: Thu 9/26/2013 3:00 PM

Recurrence: (none)

Meeting Status: Accepted

Organizer: Echols, Mabel E.

This meeting was requested by Pete Williams, Williams & Associates.

Call-in: 202-395-6392; code 3862485.

Hall-Jordan, Luke

Subject: Meeting with Watsco, re: R-22 phaseout
Location: DCRoom1310L756p20PCPoly/DC-1310L-OAR

Start: Tue 9/24/2013 1:00 PM
End: Tue 9/24/2013 2:30 PM

Recurrence: (none)

Meeting Status: Meeting organizer

Organizer: Hall-Jordan, Luke
Required Attendees: Hufford, Drusilla; Donaldson, David; Whiteley, Elizabeth
Optional Attendees: Newberg, Cindy; Godwin, Dave; Hamlin, Sally
Resources: DCRoom1310L756p20PCPoly/DC-1310L-OAR

Please note that we are in room 756.

Hall-Jordan, Luke

Subject: FW: E.O. 12866 Meeting on Protection of Stratospheric Ozone: Adjustments to the Allowance System for Controlling HCFC Production, Import, and Export for 2015-2019

Location: Room 10103 New Executive Office Building

Start: Mon 9/23/2013 4:00 PM

End: Mon 9/23/2013 4:30 PM

Recurrence: (none)

Meeting Status: Accepted

Organizer: Echols, Mabel E.

-----Original Appointment-----

From: Echols, Mabel E. [mailto:Mabel_E.Echols@omb.eop.gov]

Sent: Tuesday, September 10, 2013 11:41 AM

To: Echols, Mabel E.; Mancini, Dominic J.; Laity, Jim; Frey, Nathan J.; Finken, Anne; Arling, Jeremy; Donaldson, David; Chamberlin, JohnB; Birchfield, Norm; Orlin, David; Ulman, Christie; Huang, Jennifer (Intern); Huey, Zachary (Intern)

Subject: E.O. 12866 Meeting on Protection of Stratospheric Ozone: Adjustments to the Allowance System for Controlling HCFC Production, Import, and Export for 2015-2019

When: Monday, September 23, 2013 4:00 PM-4:30 PM (GMT-05:00) Eastern Time (US & Canada).

Where: Room 10103 New Executive Office Building

This meeting was requested by Michael Parr, DuPont Performance Coatings.

Call-in: 202-395-6392; code 3862485.

Hall-Jordan, Luke

Subject: FW: E.O. 12866 Meeting on Protection of Stratospheric Ozone: Adjustments to the Allowance System for Controlling HCFC Production, Import, and Export for 2015-2019

Location: Room 472 Eisenhower Executive Office Building

Start: Wed 9/18/2013 10:00 AM

End: Wed 9/18/2013 10:30 AM

Recurrence: (none)

Meeting Status: Accepted

Organizer: Echols, Mabel E.

-----Original Appointment-----

From: Echols, Mabel E. [mailto:Mabel_E.Echols@omb.eop.gov]

Sent: Tuesday, September 10, 2013 11:44 AM

To: Echols, Mabel E.; Mancini, Dominic J.; Laity, Jim; Frey, Nathan J.; Finken, Anne; Arling, Jeremy; Donaldson, David; Chamberlin, JohnB; Birchfield, Norm; Orlin, David; Ulman, Christie; Huang, Jennifer (Intern); Huey, Zachary (Intern)

Subject: E.O. 12866 Meeting on Protection of Stratospheric Ozone: Adjustments to the Allowance System for Controlling HCFC Production, Import, and Export for 2015-2019

When: Wednesday, September 18, 2013 10:00 AM-10:30 AM (GMT-05:00) Eastern Time (US & Canada).

Where: Room 472 Eisenhower Executive Office Building

This meeting was requested by Amy Chiang, Honeywell.

Call-in: 202-395-6392; code 3862485.

Hall-Jordan, Luke

Subject: FW: E.O. 12866 Meeting on Protection of Stratospheric Ozone: Adjustments to the Allowance System for Controlling HCFC Production, Import, and Export for 2015-2019

Location: Eisenhower Room, White House Conference Center - 726 Jackson Place, NW

Start: Thu 9/12/2013 11:30 AM

End: Thu 9/12/2013 12:00 PM

Show Time As: Tentative

Recurrence: (none)

Meeting Status: Tentatively accepted

Organizer: Echols, Mabel E.

-----Original Appointment-----

From: Echols, Mabel E. [mailto:Mabel_E.Echols@omb.eop.gov]

Sent: Thursday, September 05, 2013 4:37 PM

To: Echols, Mabel E.; Mancini, Dominic J.; Laity, Jim; Frey, Nathan J.; Finken, Anne; Arling, Jeremy; Donaldson, David; Chamberlin, JohnB; Birchfield, Norm; Orlin, David

Subject: E.O. 12866 Meeting on Protection of Stratospheric Ozone: Adjustments to the Allowance System for Controlling HCFC Production, Import, and Export for 2015-2019

When: Thursday, September 12, 2013 11:30 AM-12:00 PM (GMT-05:00) Eastern Time (US & Canada).

Where: Eisenhower Room, White House Conference Center - 726 Jackson Place, NW

This meeting was requested by Benjamin Klein, Heather Podesta & Partners on behalf of Hudson Technologies.

Call-in: 202-395-6392; code 3862485.

Hall-Jordan, Luke

Subject: Call Bob Kamins
Start: Tue 8/27/2013 10:00 AM
End: Tue 8/27/2013 10:30 AM
Recurrence: (none)
Organizer: Hall-Jordan, Luke

Phone 973 564 6400

Hall-Jordan, Luke

Subject: Meeting with Hudson, re: HCFC rule
Location: DCRoom1310L1003p20PCTVPoly/DC-1310L-OAR

Start: Thu 8/22/2013 10:30 AM
End: Thu 8/22/2013 12:00 PM

Recurrence: (none)

Meeting Status: Meeting organizer

Organizer: Hall-Jordan, Luke
Required Attendees: Hufford, Drusilla; Donaldson, David; Whiteley, Elizabeth; Hamlin, Sally; Godwin, Dave
Optional Attendees: Newberg, Cindy
Resources: DCRoom1310L1003p20PCTVPoly/DC-1310L-OAR

Hall-Jordan, Luke

Subject: Meeting with DuPont
Location: DCRoom1310L956p20PCPoly/DC-1310L-OAR
Start: Thu 7/25/2013 10:30 AM
End: Thu 7/25/2013 11:30 AM
Recurrence: (none)
Meeting Status: Meeting organizer
Organizer: Hall-Jordan, Luke
Required Attendees: Hufford, Drusilla; Labate, William
Resources: DCRoom1310L956p20PCPoly/DC-1310L-OAR

Hall-Jordan, Luke

Subject: update -22

Location: TBD

Start: Thu 7/25/2013 10:30 AM

End: Thu 7/25/2013 11:30 AM

Recurrence: (none)

Meeting Status: Accepted

Organizer: Hufford, Drusilla

Required Attendees: Donaldson, David; Hall-Jordan, Luke; Godwin, Dave; Whiteley, Elizabeth

Hall-Jordan, Luke

Subject: NRDC

Start: Wed 7/17/2013 3:00 PM
End: Wed 7/17/2013 4:00 PM

Recurrence: (none)

Meeting Status: Accepted

Organizer: Hufford, Drusilla
Required Attendees: Newberg, Cindy; McConkey, Diane; Donaldson, David; Horwitz, Paul
Optional Attendees: Hall-Jordan, Luke

We will be in room 1003 at our 1310 L building. Diane, I will send you and Paul David's backgrounder shortly.

Hall-Jordan, Luke

Subject: Call with James Burke, USA Refrigerants
Location: Dave's Office

Start: Thu 7/11/2013 11:00 AM
End: Thu 7/11/2013 12:00 PM

Recurrence: (none)

Meeting Status: Meeting organizer

Organizer: Hall-Jordan, Luke
Required Attendees: Donaldson, David; Whiteley, Elizabeth
Optional Attendees: Labate, William

Hall-Jordan, Luke

Subject: Meeting with Don Magid, Combs Investment Property, re: inventory data
Location: DCRoom1310L956p20PCPoly/DC-1310L-OAR
Start: Thu 6/20/2013 2:30 PM
End: Thu 6/20/2013 3:30 PM
Recurrence: (none)
Meeting Status: Meeting organizer
Organizer: Hall-Jordan, Luke
Required Attendees: Donaldson, David; Whiteley, Elizabeth; Labate, William
Resources: DCRoom1310L956p20PCPoly/DC-1310L-OAR

Don is going to come in around 2:30 or 2:45 to provide us with inventory data for Combs Gas between 2009 through the present. I told him David would not have to leave at 3, and he's OK with that.

Please let me know if this works ASAP. Thanks!

Hall-Jordan, Luke

Subject: Call with EPA/Polar Technologies

Start: Thu 6/20/2013 4:30 PM
End: Thu 6/20/2013 5:30 PM

Recurrence: (none)

Meeting Status: Meeting organizer

Organizer: Hall-Jordan, Luke
Required Attendees: Whiteley, Elizabeth; Ted Atwood; Walt Baker

Hall-Jordan, Luke

Subject: Call with EPA/Johnstone Supply, re: 2015-2019 HCFC Rule

Start: Thu 6/13/2013 3:30 PM

End: Thu 6/13/2013 4:30 PM

Recurrence: (none)

Meeting Status: Meeting organizer

Organizer: Hall-Jordan, Luke

Required Attendees: Steve.Porter@JOhnstonesupply.com; Jon Melchi; Labate, William

Optional Attendees: Donaldson, David

Hall-Jordan, Luke

Subject: Honeywell Meeting, re: 2015-2019 HCFC Rule

Location: Room 1003

Start: Thu 6/6/2013 1:00 PM

End: Thu 6/6/2013 2:30 PM

Recurrence: (none)

Meeting Status: Meeting organizer

Organizer: Hall-Jordan, Luke

Required Attendees: McConkey, Diane; Hufford, Drusilla; Donaldson, David; Whiteley, Elizabeth; Godwin, Dave; Hamlin, Sally; Newberg, Cindy; Labate, William

Hall-Jordan, Luke

Subject: Confirmed: Meeting with AHRI, re: 2015-2019 HCFC Rule
Location: DCRoom1310L1003p20PCTVPoly/DC-1310L-OAR

Start: Mon 6/3/2013 1:00 PM
End: Mon 6/3/2013 2:00 PM

Recurrence: (none)

Meeting Status: Meeting organizer

Organizer: Hall-Jordan, Luke
Required Attendees: Godwin, Dave; Donaldson, David; Whiteley, Elizabeth; Hufford, Drusilla; Newberg, Cindy; Labate, William
Resources: DCRoom1310L1003p20PCTVPoly/DC-1310L-OAR

We can also discuss 22a.

Hall-Jordan, Luke

Subject: Call with Derek Jose, re: R-22

Start: Thu 5/30/2013 2:00 PM

End: Thu 5/30/2013 2:30 PM

Recurrence: (none)

Organizer: Hall-Jordan, Luke

Hall-Jordan, Luke

Subject: Meeting with Arkema, re: 2015-2019 HCFC Rule
Location: DCRoom1310L1003p20PCTVPoly/DC-1310L-OAR

Start: Tue 5/28/2013 10:00 AM
End: Tue 5/28/2013 11:00 AM

Recurrence: (none)

Meeting Status: Meeting organizer

Organizer: Hall-Jordan, Luke
Required Attendees: Hufford, Drusilla; Donaldson, David; Whiteley, Elizabeth
Optional Attendees: Newberg, Cindy; Godwin, Dave
Resources: DCRoom1310L1003p20PCTVPoly/DC-1310L-OAR

Cindy – Please let me know if you want me to invite anyone else from AERB.

Hall-Jordan, Luke

Subject: Confirmed: Meeting with DuPont, re: HCFCs
Location: DCRoom1310L1003p20PCTVPoly/DC-1310L-OAR

Start: Wed 5/22/2013 1:00 PM
End: Wed 5/22/2013 3:00 PM

Recurrence: (none)

Meeting Status: Meeting organizer

Organizer: Hall-Jordan, Luke
Required Attendees: Hufford, Drusilla; Donaldson, David; Whiteley, Elizabeth; Godwin, Dave
Optional Attendees: Hamlin, Sally; Newberg, Cindy; Rim, Elisa
Resources: DCRoom1310L1003p20PCTVPoly/DC-1310L-OAR

I doubt this will last this long, but just in case...

Hall-Jordan, Luke

Subject: Meeting with HARDI at 1 pm
Location: Hyatt on Capitol Hill
Start: Tue 5/21/2013 12:30 PM
End: Tue 5/21/2013 2:30 PM
Recurrence: (none)
Meeting Status: Meeting organizer
Organizer: Hall-Jordan, Luke
Required Attendees: Donaldson, David; Whiteley, Elizabeth
Optional Attendees: Hufford, Drusilla

Hall-Jordan, Luke

Subject: Confirmed: Alliance Meeting re: HCFC rules
Location: Room 152

Start: Tue 5/14/2013 9:30 AM
End: Tue 5/14/2013 11:00 AM

Recurrence: (none)

Meeting Status: Meeting organizer

Organizer: Hall-Jordan, Luke
Required Attendees: Hufford, Drusilla; Whiteley, Elizabeth; Donaldson, David; Dave Stirpe
Optional Attendees: Newberg, Cindy; Hamlin, Sally; Godwin, Dave; Rim, Elisa; Gatica, Staci
Resources: DCRoom1310L1003p20PCTVPoly/DC-1310L-OAR

Hall-Jordan, Luke

Subject: Meet with Hudson Technologies
Location: DCRoom1310L1003p20PCTVPoly/DC-1310L-OAR

Start: Tue 5/14/2013 12:30 PM
End: Tue 5/14/2013 1:30 PM

Recurrence: (none)

Meeting Status: Accepted

Organizer: Donaldson, David
Required Attendees: Hall-Jordan, Luke; Whiteley, Elizabeth; Hamlin, Sally; Hufford, Drusilla
Optional Attendees: Newberg, Cindy

Hall-Jordan, Luke

Subject: Meeting with National Refrigerants
Location: DCRoom1310L1003p20PCTVPoly/DC-1310L-OAR

Start: Tue 5/7/2013 10:00 AM
End: Tue 5/7/2013 11:00 AM

Recurrence: (none)

Meeting Status: Accepted

Organizer: Donaldson, David
Required Attendees: Hufford, Drusilla; Hall-Jordan, Luke; Whiteley, Elizabeth; Newberg, Cindy;
mbeatty@refrigerants.com

Our address is 1310 L St Northwest, Washington D.C.

Please call me when you arrive and I will escort you through building security.

Office: 202-343-9086
Mobile: 202-604-2207

I look forward to our meeting.

David

Hall-Jordan, Luke

Subject: NRDC Meeting on HCFC Rule
Location: DCRoom1310L1003p20PCTVPoly/DC-1310L-OAR

Start: Thu 4/25/2013 2:00 PM
End: Thu 4/25/2013 3:00 PM

Recurrence: (none)

Meeting Status: Meeting organizer

Organizer: Hall-Jordan, Luke
Required Attendees: Hufford, Drusilla; Donaldson, David; Whiteley, Elizabeth; David Doniger; McConkey, Diane
Optional Attendees: khenderson@nrdc.org
Resources: DCRoom1310L1003p20PCTVPoly/DC-1310L-OAR

Hall-Jordan, Luke

Subject: EPA/HARDI Call

Start: Mon 4/1/2013 4:00 PM
End: Mon 4/1/2013 4:30 PM

Recurrence: (none)

Meeting Status: Meeting organizer

Organizer: Hall-Jordan, Luke
Required Attendees: Donaldson, David; Whiteley, Elizabeth; Jon Melchi

Call-in number: 202-343-2372